

# Exhibit 30

# GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue  
New York, NY 10166-0193  
Tel 212.351.4000  
www.gibsondunn.com

January 6, 2022

Laura C. Mumm  
Direct: +1 212.351.2404  
Fax: +1 212.817.9504  
LMumm@gibsondunn.com

## VIA JAMS ACCESS

Re: *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, 3:18-md-02843

Dear Special Master Garrie:

Pursuant to the Special Master's Amended Order re: Plaintiffs' Motion to Compel Production of Plaintiff Data, Facebook has enclosed a document containing descriptions of the 149 data systems identified in the Declaration of David Pope as storing or interacting with user data. Consistent with the Special Master's Orders and statements on the record, the descriptions Facebook is providing consist of existing materials prepared by Mr. Pope's team in the course of its work, which was unrelated to this or any litigation.

Facebook has not identified additional existing, readily accessible materials identifying (1) "a description of the types of Named Plaintiff data contained" in each data system; or (2) the "most common functions and purpose" of each data system or "the business units, divisions, or groups" that use the systems. Where Facebook has not been able to provide additional data, Facebook has provided an explanation as to "why this information is not readily accessible," as required by the Order.

Facebook is providing this information pursuant and subject to the terms of the Protective Order that was negotiated by the parties and entered by the Court in this action and has marked this submission Highly Confidential – Attorneys' Eyes Only. These confidential materials are being submitted pursuant to the Special Master's Order for use only in connection with the parties' dispute as to the production of data relating to the Named Plaintiffs, and without prejudice to Facebook's rights and privileges.

The Special Master has also ordered Facebook to make Mr. Pope available ex parte on or before January 14, 2022. Mr. Pope is available from noon PT to 1 pm PT on January 14, 2022.

Respectfully submitted,

*/s/ Laura C. Mumm*

Laura C. Mumm

# GIBSON DUNN

Page 2 of 2

cc: Lesley E. Weaver

Derek W. Loeser

Enclosure